

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



August 30, 1991

ALL-COUNTY LETTER NO. 91-88

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY GAIN COORDINATORS

SUBJECT: EDUCATIONAL SERVICES FOR GREATER AVENUES FOR INDEPENDENCE  
(GAIN) PARTICIPANTS

REFERENCE: Manual of Policies and Procedures (MPP) Section 42-740.2

This letter is to provide you with instructions for requesting exemptions from the requirement that educational contracts paid for with GAIN funds be based on fixed-unit-price performance-based criteria.

BACKGROUND

The MPP Section 42-740.21 requires that any payments for contracted training and educational services shall be based on fixed-unit-price performance-based criteria. Some counties, especially smaller counties, have experienced difficulty in providing and maintaining educational services for GAIN clients while complying with performance-based requirements. Examples of the problems which interfere with a county's ability to provide these services include:

- 1) The county lacks an approved adult education program.
- 2) An adult education program exists, but the number of referrals does not generate enough Average Daily Attendance (ADA) revenue to cover minimum costs of a classroom.
- 3) The Job Training Partnership Act (JTPA) eight percent money is either unavailable or insufficient to pay for GAIN classroom costs.
- 4) Small counties may not have access to community colleges willing to provide basic education services.
- 5) Private providers are unable/unwilling to sign performance-based contracts to provide basic education services.

To alleviate this situation, Assembly Bill 312, Chapter 1568, Statutes of 1990, provided a process for exempting counties from the performance-based contract requirements for educational services. The MPP Section 42-740.23 implemented this provision as follows:

"The CWD shall be permitted to enter into contracts for educational services without having to adhere to the contracting requirements of Section 42-740.21, when the CWD is unable to obtain educational services due to the absence of an available adult education program or the small number of GAIN referrals. Utilization of this exemption shall require prior review and approval by SDSS."

Our statewide survey of education programs conducted in April 1991 identified 10 to 15 counties that have potential problems in this regard. All have small or very small Aid to Families with Dependent Children and GAIN caseloads. However, the conditions which justify an exemption may occur in some geographic areas of large counties as well.

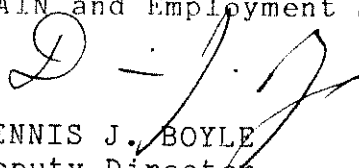
#### EXEMPTION PROCESS

To qualify for the exemption allowed by section 42-740.2, the county must obtain prior approval from the GAIN and Employment Services Operations Bureau. Information which will assist the GAIN analyst in making an exemption evaluation may include but is not limited to the following:

- 1) Information showing that no adult education program exists within the county or that the small number of GAIN referrals is insufficient to generate the revenue required to fund the cost of the educational program.
- 2) A brief description of the problem and prior efforts to resolve it. Efforts to obtain educational services from local schools and the results of those efforts should be detailed.
- 3) The number of clients to be served and the number and location of educational sites required.
- 4) Information documenting that all other available resources, such as JTPA eight percent funds, have been used.

The county's GAIN analyst will review the request and work with county staff to resolve barriers to providing educational services to GAIN participants. Once approved, the county's procedure will be subject to review and approval as an ongoing part of the county's annual GAIN plan update.

If you have any questions regarding this letter, please contact your GAIN and Employment Services Operations Bureau, at (916) 324-6962.

  
DENNIS J. BOYLE  
Deputy Director